

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.; HYNIX  
SEMICONDUCTOR AMERICA, INC.;  
HYNIX SEMICONDUCTOR U.K. LTD.; and  
HYNIX SEMICONDUCTOR  
DEUTSCHLAND GmbH,

Plaintiffs,

vs.

RAMBUS INC.,

Defendant.

CASE NO. C 00-20905 RMW

~~{PROPOSED}~~ ORDER AND STIPULATION  
EXTENDING TIME

Judge: Hon Ronald M. Whyte

RAMBUS INC.,

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., HYNIX  
SEMICONDUCTOR AMERICA INC.,  
HYNIX SEMICONDUCTOR  
MANUFACTURING AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC., SAMSUNG SEMICONDUCTOR,  
INC., SAMSUNG AUSTIN  
SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION,  
NANCY TECHNOLOGY CORPORATION  
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

RAMBUS INC.,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC., SAMSUNG SEMICONDUCTOR,  
INC., SAMSUNG AUSTIN  
SEMICONDUCTOR, L.P.,

Defendants.

CASE NO. C 05-02298 RMW

RAMBUS INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY, INC., and  
MICRON SEMICONDUCTOR PRODUCTS,  
INC.,

Defendants.

CASE NO. C 06-00244 RMW

**STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING TIME**

Whereas the Court entered a Joint Case Management Order ("CMO") on April 24, 2007;

Whereas the CMO provides that July 20, 2007 is the date on which the party or parties with the burden of proof on an issue is required to provide an expert report on that issue;

Whereas the CMO set August 17, 2007 as the date on which the parties are required to provide rebuttal expert disclosures and reports;

Whereas the expert discovery cutoff set forth in the CMO is September 17, 2007;

Whereas the CMO set October 1, 2007 as the last day to file summary judgment and Daubert motions;

Whereas, on June 27, 2007, the Court scheduled a further case management conference to take place on November 7, 2007;

Whereas Micron Technology, Inc., Micron Semiconductor Products, Inc., Hynix Semiconductor, Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd., Hynix Semiconductor Deutschland, GmbH, Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, L.P., Nanya Technology Corporation and Nanya Technology Corporation USA (collectively the "Manufacturers") and Rambus Inc. served their expert disclosures on June 22, 2007;

Whereas the Manufacturers' experts require additional time to complete their expert reports;

Whereas the Manufacturers requested a twelve-day extension of time to submit any party's initial expert report(s), and Rambus Inc. agreed to the Manufacturers' request;

Whereas Rambus in turn requested a twenty-four-day extension of the time to submit any party's rebuttal report(s), and the Manufacturers agreed to Rambus's request;

Whereas the parties have agreed, subject to the Court's approval, to modify the schedule set forth in the Joint Case Management Order dated April 24, 2007;

NOW therefore, it is hereby AGREED and STIPULATED, by and among the parties hereto through their undersigned counsel, that: (i) the date on which the party or parties with the burden of proof on an issue shall provide an expert report on that issue is moved from July 20, 2007 to August 1, 2007; (ii) the date on which the parties shall provide rebuttal expert disclosures and reports is moved from August 17, 2007 to September 10, 2007; (iii) the last day for expert discovery is moved from September 17, 2007 to October 8, 2007; (iv) the last day to file summary judgment and Daubert motions is moved from October 1, 2007 to October 17, 2007; and (v) the further case management conference and the hearing date for summary judgment and Daubert motions is moved from November 7, 2007 to November 21, 2007.

SO ORDERED,

DATED: 7/16/07



HON. RONALD M. WHYTE

DATED: July 12, 2007

Respectfully submitted,

FOR THE MANUFACTURERS

By /s/ Hal Barza

Harold A. Barza

William Price

Robert Becher

QUINN EMANUEL URQUHART OLIVER & HEDGES

865 South Figueroa Street, 10th Floor

Los Angeles, California 90017-2543

Jared Bobrow

John D. Beynon

WEIL, GOTSHAL & MANGES LLP

Redwood Shores, CA 94065

Attorneys for

MICRON TECHNOLOGY, INC., and

MICRON SEMICONDUCTOR PRODUCTS, INC.

By /s/ Anita Kadala

David J. Healey

Anita E. Kadala

WEIL, GOTSHAL & MANGES LLP

Houston, TX 77002

Alan J. Weinschel

WEIL, GOTSHAL & MANGES LLP

New York, NY 10153

Matthew D. Powers

Edward R. Reines

WEIL, GOTSHAL & MANGES LLP

Redwood Shores, CA 94065

Attorneys for

SAMSUNG ELECTRONICS CO., LTD.,

SAMSUNG ELECTRONICS AMERICA, INC.,

SAMSUNG SEMICONDUCTOR, INC., and

SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

By /s/ Robert Freitas

Robert E. Freitas

Kai Tseng

Craig R. Kaufman

Denise M. Mingrone

ORRICK, HERRINGTON & SUTCLIFFE LLP

Menlo Park, CA 94025

Attorneys for

NANYA TECHNOLOGY CORPORATION and NANYA

TECHNOLOGY CORPORATION U.S.A.

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By /s/ Susan van Keulen  
Theodore G. Brown, III  
Susan van Keulen  
TOWNSEND and TOWNSEND and CREW LLP  
379 Lytton Avenue  
Palo Alto, California 94301  
  
Attorneys for  
HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR  
AMERICA INC., HYNIX SEMICONDUCTOR  
MANUFACTURING AMERICA INC., HYNIX  
SEMICONDUCTOR U.K. LTD., and HYNIX  
SEMICONDUCTOR DEUTSCHLAND GmbH

DATED: July 12, 2007 FOR RAMBUS INC.

By /s/  
Carolyn Hoecker Luedtke  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street, 27<sup>th</sup> Floor  
San Francisco, CA 94105  
  
Attorneys for  
RAMBUS INC.

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2 **Notice of this document has been electronically sent to:**3 **Counsel for Plaintiff(s):**

4 Craig N. Tolliver	ctolliver@mckoolsmith.com
5 Pierre J. Hubert	phubert@mckoolsmith.com
6 Brian K. Erickson	berickson@dbllp.com,
7 David C. Vondle	dvondle@akingump.com
8 Gregory P. Stone	gregory.stone@mto.com
9 Carolyn Hoecker Luedtke	luedtkech@mto.com
Peter A. Detre	detrepa@mto.com
Burton Alexander Gross	burton.gross@mto.com,
Steven McCall Perry	steven.perry@mto.com
Jeannine Y. Sano	sanoj@howrey.com

10 **Counsel for Defendant(s):**

11 Matthew D. Powers	matthew.powers@weil.com
12 David J. Healey	david.healey@weil.com
13 Edward R. Reines	Edward.Reines@weil.com
14 John D Beynon	john.beynon@weil.com
15 Jared Bobrow	jared.bobrow@weil.com
16 Leeron Kalay	leeron.kalay@weil.com
17 Theodore G. Brown, III	tgbrown@townsend.com
18 Daniel J. Furniss	djfurniss@townsend.com
19 Jordan Trent Jones	jtjones@townsend.com
Kenneth L. Nissly	kennissly@thelenreid.com
Geoffrey H. Yost	gyost@thelenreid.com
Susan Gregory van Keulen	svankeulen@thelenreid.com
Patrick Lynch	plynch@omm.com
Jason Sheffield Angell	jangell@orrick.com
Vickie L. Feeman	vfeeman@orrick.com
Mark Shean	mshean@orrick.com
Kai Tseng	hlee@orrick.com

20 Counsel are responsible for distributing copies of this document to co-counsel that have not  
 21 registered for e-filing under the court's CM/ECF program.

22 **Dated:** 7/16/07 SPT  
 23 **Chambers of Judge Whyte**

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